

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

REED BEIDLER,)	Case No. 1:25-CV-06074
)	
Plaintiff,)	Hon. Edmond Chang
)	
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
_____)	

Joint Initial Status Report

Pursuant to the Court's minute entry at Doc. No. 11, Plaintiff Reed Beidler and Defendant United States of America (together, the "Parties") submit the following Joint Initial Status Report. The United States' participation in this status report does not constitute an answer or response to the complaint or waive the remaining time it has to file such an answer or other response to the complaint.

(1) Nature of the case:

- a. Identify the attorneys of record for each party, including the lead trial attorneys.

Plaintiff Reed Beidler is represented by: Kathleen Marie Lach (lead trial attorney), Adam Scott Fayne, and Bethany LeeAnn Beaver, Saul Ewing LLP, 161 N. Clark Street, Suite 4200, Chicago, IL 60601.

Defendant United States of America is represented by Mary A. Stallings (lead trial attorney) and Paige Bingham, U.S. Department of Justice, Tax Division, P.O. Box. 55, Washington, D.C. 20044.

- b. State the basis for federal jurisdiction.

Plaintiff states jurisdiction exists over this action pursuant to 28 U.S.C. § 1346(a)(1) and the Internal Revenue Code, 26 U.S.C. § 7422. Defendant states if jurisdiction exists, it exists under 28 U.S.C. § 1346 and 26 U.S.C. § 7422.

- c. Describe the nature of the claims asserted in the complaint and any counterclaims.

Plaintiff Reed Beidler seeks the refund of penalties assessed under I.R.C. §§ 6039F and/or 6677 (relating to foreign trust and foreign gift reporting) for tax year 2012. Plaintiff also alleges that the penalties at issue were not assessable against the Plaintiff because the IRS did not have the authority to assess such penalties.

- d. State the major legal and factual issues in the case.

Whether plaintiff is entitled to the refund of civil penalties assessed under 26 U.S.C. §§ 6039 and/or 6677 in the amount of \$1,096,549.72, plus interest, for tax year 2012.

Whether the IRS erroneously determined Plaintiff was the owner of the subject Trust.

Whether there is jurisdiction over Count II of the complaint on the basis that this issue was not raised in plaintiff's administrative claim for refund.

Whether plaintiff is entitled to an award of attorney's fees pursuant to 26 U.S.C. § 7430.

- e. Describe the relief sought by the plaintiff.

Plaintiff seeks a refund of civil penalties paid in the amount of \$1,096,549.72, plus interest, and an award of attorney's fees and costs pursuant to 26 U.S.C. § 7430.

(2) Pending Motions and Case Plan:

- a. State the status of service of process on each defendant.

Service has been affected on Defendant the United States.

- b. Identify all pending motions.

N/A

- c. Submit a proposal for a discovery plan, including the following information:

- i. The general type of discovery needed.

At this time, Defendant United States anticipates requesting the following types of discovery: deposition of the Plaintiff, interrogatories, requests for production of documents, and third-party written and oral (third-party deposition) discovery.

At this time, Plaintiff anticipates requesting the following types of discovery, including but not limited to, interrogatories, requests for production of documents, and third party discovery.

- ii. A date for Rule 26(a)(1) disclosures.

September 9, 2025.

- iii. A date to issue the first-set of written discovery requests.

October 10, 2025.

- iv. A fact discovery completion date.

July 31, 2026.

- v. If there will be expert discovery, an expert discovery completion date, including dates for the delivery of expert reports (or summaries for non-retained expert discovery).

The parties do not anticipate the need for expert discovery at this time.

- vi. A deadline under Civil Rule 16(b) to add parties or to amend pleadings.

December 30, 2025.

- vii. A date for the filing of dispositive motions.

September 18, 2026.

- d. State whether a jury trial is requested and the probable length of trial (including jury selection, jury addresses, and jury deliberations).

No jury demand has been made. At this time (without the benefit of discovery), the parties estimate that a bench trial will last 2-3 days.

- e. State whether the parties agree to service of pleadings and other papers by electronic means under Federal Rule of Civil Procedure 5(b)(2)(E).

Yes.

(3) Consent to Proceed Before a Magistrate Judge:

- a. State whether the parties consent unanimously to proceed before a Magistrate Judge for all purposes, including entry of final judgment. The Court strongly encourages parties to consent to the jurisdiction of the Magistrate Judge. Of

course, the parties are free to withhold consent without any adverse substantive consequences.

The parties do not consent to proceed before a Magistrate Judge.

(4) Status of Settlement Discussions:

- a. State whether any settlement discussions have occurred.

No settlement discussions have occurred. The United States' time to respond to the complaint has not expired.

- b. Describe the status of any settlement discussions; and

The parties have not engaged in any settlement discussions.

- c. Whether the parties request a settlement conference.

The parties do not request a settlement conference at this time.

Signatures:

For Plaintiff
Reed Beidler,

/s/ Kathleen Marie Lach
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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of July 2025, the foregoing document was filed electronically using the Court's ECF system. The filing is available for viewing and downloading from the ECF system.

/s/ Mary A. Stallings

MARY A. STALLINGS

Trial Attorney

United States Department of Justice, Tax Division